

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

[1] ANGEL CARRER-RIVERA,
(Counts 1 through 49),
[2] RICHARD RIVERA-MAITIN,
(Counts 1 through 49),
[3] VICTOR GARCIA-SOTO,
(Counts 1, 2, 5, 7, 10 through 22),
[4] BRENDA GARCIA,
(Counts 1, 2, 5, 7, 9 through 24),
[5] GABRIEL GARCIA,
(Counts 1, 2, 5, 18 through 22),
[6] RANDOLPH BAEZ,
(Counts 1, 2, 9, 23, and 24),
[7] JOSE TORRES-ROSADO,
(Counts 1, 2, 8, 25 through 27),
[8] ELADIO PAGAN,
(Counts 1, 2, 3, 28 through 38),
[9] IGNACIO RAMOS-CLASS,
(Counts 1, 2, 39 through 44),
[10] FELIX ARROYO-RIVERA,
(Counts 1, 2, 6, 45 through 49),
Defendants.

INDICTMENT

CRIMINAL NO. 25-240(FAB)

VIOLATIONS:

Count 1:

18 U.S.C. §§ 371 & 641

Count 2:

18 U.S.C. §§ 1341, 1343, & 1349

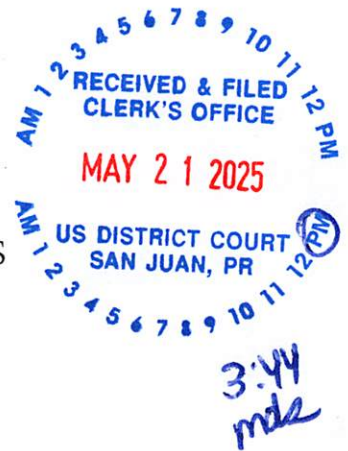
Counts 3-9:

18 U.S.C. § 1341

Counts 10 - 49:

18 U.S.C. § 1343

FORTY-NINE COUNTS
PLUS FORFEITURE



THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

At all times material to this Indictment:

1. The United States Department of Veterans Affairs (VA) was a federal agency that provided a variety of services to eligible United States military veterans, their dependents, and survivors.

2. The Veteran's Benefits Administration (VBA) was one of the three administrations falling under the VA's larger umbrella. The VBA was responsible for administering the VA's programs that provided financial and other forms of assistance. VA benefits included veterans' compensation/disability benefits, pension and survivor benefits, rehabilitation and employment assistance, education assistance, home loan guarantees, and life insurance coverage.

3. [1] ANGEL CARRER-RIVERA, was a resident of Vega Baja, PR, and started working at the VA in January 2009. In February 2020, he was promoted to VA Coach where he supervised eighteen Rating Veteran Service Representatives (RVSA) who adjudicated (granted, denied, confirmed, and continuing) veteran disability claims.

4. [2] RICHARD RIVERA-MAITIN, was a resident of Morovis, the owner of an auto repair business owner, and a veteran but not employed by the VA. He identified veterans who did not have a 100% disability rating and offered to help them obtain a 100% rating for an upfront cash fee plus a percentage of any backpay the veteran received. [2] RICHARD RIVERA-MAITIN instructed veterans exactly what false information to provide when attending medical evaluations and completing their disability application paperwork.

5. [2] RICHARD RIVERA-MAITIN assisted, among others, the following veterans, to fraudulently obtain significant disability ratings, who worked full time in demanding occupations:

[3] VICTOR GARCIA-SOTO -- a 100% disability rating;

[5] GABRIEL GARCIA – a police officer with a 100% disability rating;

[6] RANDOLPH BAEZ – a commercial flight attendant with a 60% disability rating;

[7] JOSE TORRES-ROSADO – a 90% disability rating;

[8] ELADIO PAGAN -- a commercial airline pilot with a 70% disability rating;

[9] IGNACIO RAMOS-CLASS – a Department of Homeland Security officer with a 100% disability rating; and

[10] FELIX ARROYO-RIVERA – a 90% disability rating.

6. [4] BRENDA GARCIA was the wife of [3] VICTOR GARCIA-SOTO, mother of [5] GABRIEL GARCIA, and sister of [6] RANDOLPH BAEZ.

7. The National Work Queue (NWQ) was a computerized system which distributed veteran disability cases to each VA office's workload each morning. The intent of the NWQ was to work the next "ripe" case, which was prioritized based on the age of the claim, certain priority factors of the claim, and how long the claim had been in its current status.

8. The Veterans Benefits Management System (VBMS) was a computerized system which displayed information pertaining to the veteran's military service, financial information, medical evaluations, disability benefits ratings, disability awards information, and current disability compensation rate, if any.

CONSPIRACY AND SCHEME TO DEFRAUD

9. It was the purpose of the conspiracy and scheme to defraud that [1] ANGEL DAVID CARRER-RIVERA, [2] RICHARD RIVERA-MAITIN, [3] VICTOR RODOLFO GARCIA, [4] BRENDA GARCIA, [5] GABRIEL GARCIA, [6] RANDOLPH BAEZ, [7] JOSE TORRES-ROSADO, [8] ELADIO PAGAN, [9] IGNACIO RAMOS-CLASS, and [10] FELIX ARROYO-RIVERA engaged in deceptive conduct designed to fraudulently obtain VA disability benefits by causing false medical conditions to be claimed in VA disability applications.

10. It was further part of the conspiracy and scheme to defraud that [1] ANGEL DAVID CARRER-RIVERA, [2] RICHARD RIVERA-MAITIN, [3] VICTOR RODOLFO GARCIA, [4] BRENDA GARCIA, [5] GABRIEL GARCIA, [6] RANDOLPH BAEZ, [7] JOSE TORRES-ROSADO, [8] ELADIO PAGAN, [9] IGNACIO RAMOS-CLASS, and [10] FELIX ARROYO-RIVERA financially enriched themselves by causing false VA disability applications to be submitted and approved in order to obtain lifetime disability benefits to which veterans applying for the benefits were not entitled.

MANNER AND MEANS

11. The manner and means by which the defendants carried out the conspiracy and scheme included, but were not limited to, the following:

- a) [1] ANGEL CARRER-RIVERA would use his position within the VA to help coach veterans as to which false medical conditions should be claimed in their respective disability application. [1] ANGEL CARRER-

RIVERA would then improperly access the NWQ to pull that veteran's application and assign it to one of the RVSA's he supervised.

b) [2] RICHARD RIVERA-MAITIN acted as a facilitator between the applying veterans and [1] ANGEL CARRER-RIVERA. [2] RICHARD RIVERA-MAITIN would relay the personal identifying information of the applying veteran to [1] ANGEL CARRER-RIVERA who would then access the NWQ to verify that the veteran was in the system. [2] RICHARD RIVERA-MAITIN would then receive instructions from [1] ANGEL CARRER-RIVERA regarding what false medical conditions to claim in the VA disability applications and then [2] RICHARD RIVERA-MAITIN would pass that information along to the applying veterans.

c) [3] VICTOR RODOLFO GARCIA, [5] GABRIEL GARCIA, [6] RANDOLPH BAEZ, [7] JOSE TORRES-ROSADO, [8] ELADIO PAGAN, [9] IGNACIO RAMOS-CLASS, and [10] FELIX ARROYO-RIVERA would cause the false medical conditions they received from [2] RICHARD RIVERA-MAITIN to be included in their respective VA disability applications.

COUNT ONE

(18 U.S.C. §§ 371 and 641 – Theft of Government Money; Conspiracy)

1. The general allegations in paragraphs 1-11 are realleged and incorporated by reference as if fully set forth herein.

2. From in or about February 2020, up to and including the date of this Indictment, in the District of Puerto Rico and within the jurisdiction of this Court, the defendants,

[1] ANGEL CARRER-RIVERA,
[2] RICHARD RIVERA-MAITIN,
[3] VICTOR GARCIA-SOTO,
[4] BRENDA GARCIA,
[5] GABRIEL GARCIA,
[6] RANDOLPH BAEZ,
[7] JOSE TORRES-ROSADO,
[8] ELADIO PAGAN,
[9] IGNACIO RAMOS-CLASS, and
[10] FELIX ARROYO-RIVERA,

did combine, conspire, confederate and agree with each other, and others known and unknown to the grand jury, to willfully and knowingly embezzle, steal, purloin, and convert to their own use or the use of another, money of the United States over the amount of \$1,000.00 in violation of 18 U.S.C. §§ 371 and 641 and to defraud the United States of and concerning its government functions and rights, that is of and concerning its right to have its business and its affairs, and particularly the transaction of the official business of the VA, conducted honestly and impartially, free from corruption, fraud, improper and undue influence, dishonesty, unlawful impairment and obstruction in violation of 18 U.S.C. § 371.

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

3. The following overt acts occurred during the timeframe charged in this Indictment in furtherance of the conspiracy:

- a) [1] ANGEL CARRER-RIVERA repeatedly accessed the NWQ to pull and assign claims; repeatedly accessed the VBMS to create and monitor veteran disability applications; supplied false medical conditions for veterans to use in their disability applications; and approved veterans disability payments based on false information.
- b) [2] RICHARD RIVERA-MAITIN repeatedly met with and spoke to veterans for the purpose of recruiting and coaching them through the VA disability application process by providing them the false medical conditions to be used in their disability applications, and repeatedly sent personal identifying information of veterans to [1] ANGEL CARRER-RIVERA.
- c) [1] ANGEL CARRER-RIVERA and [2] RICHARD RIVERA-MAITIN charged and received payments and things of value in exchange for facilitating the approval of VA disability applications based on false information.
- d) On December 9, 2024, [4] BRENDA GARCIA spoke by phone to, and met with, [2] RICHARD RIVERA-MAITIN about getting [3] VICTOR GARCIA-SOTO disability benefits.
- e) On December 13, 2024, [3] VICTOR GARCIA-SOTO submitted a VA disability application containing false medical information for the purpose of receiving disability benefits which he was awarded in January 2025.

- f) On January 16 and 22, 2025, [5] GABRIEL GARCIA made two wire transfers totaling \$16,270.00 to the joint bank account of [3] VICTOR GARCIA-SOTO and [4] BRENDA GARCIA for the purpose of paying [2] RICHARD RIVERA-MAITIN for his assistance in getting [5] GABRIEL GARCIA a 100% disability rating in one day.
- g) On January 23, 2025, and February 3, 2025, [3] VICTOR GARCIA-SOTO made cash withdrawals totaling \$30,000.00 for the purpose of paying [2] RICHARD RIVERA-MAITIN for his assistance in getting [3] VICTOR GARCIA-SOTO and [5] GABRIEL GARCIA a 100% disability rating.
- h) On January 27, 2025, [4] BRENDA GARCIA spoke by phone to [2] RICHARD RIVERA-MAITIN about getting [6] RANDOLPH BAEZ disability benefits.
- i) On January 30, 2025, [6] RANDOLPH BAEZ spoke by phone to [2] RICHARD RIVERA-MAITIN about how much money [6] RANDOLPH BAEZ would have to pay to [2] RICHARD RIVERA-MAITIN in order to receive disability benefits which he eventually received in April 2025.
- j) On January 11, 2025, [7] JOSE TORRES-ROSADO spoke by phone to [2] RICHARD RIVERA-MAITIN to coordinate an in-person meeting. On February 13, 2025, [7] JOSE TORRES-ROSADO spoke by phone to [2] RICHARD RIVERA-MAITIN wherein [2] RICHARD RIVERA-

MAITIN congratulated [7] JOSE TORRES-ROSADO on his obtaining 100% disability.

- k) On August 7, 2024, [8] ELADIO PAGAN submitted a VA disability application containing false medical information for the purpose of receiving disability benefits.
- l) On February 27, 2025, and March 15, 2025, [8] ELADIO PAGAN made two cash withdrawals totaling \$12,397.00 for the purpose of paying [2] RICHARD RIVERA-MAITIN for his assistance in getting [8] ELADIO PAGAN a 70% disability rating.

COUNT TWO

(18 U.S.C. §§ 1341, 1343, and 1349 – Mail and Wire Fraud, Conspiracy)

1. The general allegations in paragraphs 1-11 are realleged and incorporated by reference, as if fully set forth herein.

2. From in or about February 2020, up to and including the date of this Indictment, in the District of Puerto Rico and within the jurisdiction of this Court, the defendants

[1] ANGEL CARRER-RIVERA,
[2] RICHARD RIVERA-MAITIN,
[3] VICTOR GARCIA-SOTO,
[4] BRENDA GARCIA,
[5] GABRIEL GARCIA,
[6] RANDOLPH BAEZ,
[7] JOSE TORRES-ROSADO,
[8] ELADIO PAGAN,
[9] IGNACIO RAMOS-CLASS, and
[10] FELIX ARROYO-RIVERA

did combine, conspire, confederate and agree with each other, and others known and unknown to the grand jury, having devised and intending to devise the above-described scheme and artifice to defraud and deprive, by means of material false and fraudulent pretenses, representations, and promises, and for the purpose of executing the above-described scheme and artifice to defraud and deprive, knowingly caused to be delivered by the U.S. Postal Service letters which fraudulently awarded VA disability benefits, and transmitted and caused to be transmitted by means of wire communications in interstate commerce, any writings, signs, signals, pictures, and sounds.

All in violation of 18 U.S.C. §§ 1341, 1343, and 1349.

COUNTS THREE THROUGH NINE
(18 U.S.C. §§ 1341 – Mail Fraud)

1. The general allegations in paragraphs 1-11 are realleged and incorporated by reference, as if fully set forth herein.
2. From in or about February 2020, up to and including the date of this Indictment, in the District of Puerto Rico and within the jurisdiction of this Court, the defendants

[1] ANGEL CARRER-RIVERA,
[2] RICHARD RIVERA-MAITIN,
[3] VICTOR GARCIA-SOTO,
[4] BRENDA GARCIA,
[5] GABRIEL GARCIA,
[6] RANDOLPH BAEZ,
[7] JOSE TORRES-ROSADO,
[8] ELADIO PAGAN,
[9] IGNACIO RAMOS-CLASS, and
[10] FELIX ARROYO-RIVERA

having devised and intending to devise the above-described scheme and artifice to defraud and deprive, by means of material false and fraudulent pretenses, representations, and promises, and for the purpose of executing the above-described scheme and artifice to defraud and deprive, knowingly caused to be delivered a letter by the United States Postal Service at the place at which it was directed to be delivered to the person to whom it was addressed, as more fully described below:

Count	Defendant(s)	Date	VA Disability Rating Letter Addressed to
3	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [8] ELADIO PAGAN	11/09/2024	[8] ELADIO PAGAN
4	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [9] IGNACIO RAMOS-CLASS	12/11/2024	[9] IGNACIO RAMOS-CLASS
5	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [3] VICTOR GARCIA-SOTO [4] BRENDA GARCIA [5] GABRIEL GARCIA	01/08/2025	[5] GABRIEL GARCIA
6	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [10] FELIZ ARROYO	1/17/2025	[10] FELIZ ARROYO
7	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [3] VICTOR GARCIA-SOTO [4] BRENDA GARCIA	01/31/2025	[3] VICTOR GARCIA
8	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [7] JOSE TORRES-ROSADO	02/04/2025	[7] JOSE TORRES-ROSADO

9	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [4] BRENDA GARCIA [6] RANDOLPH BAEZ	04/07/2025	[6] RANDOLPH BAEZ
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All in violation of 18 U.S.C. § 1341.

COUNTS TEN THROUGH FORTY-NINE
(18 U.S.C. § 1343 – Wire Fraud)

1. The general allegations in paragraphs 1-11 are realleged and incorporated by reference, as if fully set forth herein.

2. From in or about February 2020, up to and including the date of this Indictment, in the District of Puerto Rico and within the jurisdiction of this Court, the defendants

[1] ANGEL CARRER-RIVERA,
[2] RICHARD RIVERA-MAITIN,
[3] VICTOR GARCIA-SOTO,
[4] BRENDA GARCIA,
[5] GABRIEL GARCIA,
[6] RANDOLPH BAEZ,
[7] JOSE TORRES-ROSADO,
[8] ELADIO PAGAN,
[9] IGNACIO RAMOS-CLASS, and
[10] FELIX ARROYO-RIVERA

having devised and intending to devise the above-described scheme and artifice to defraud and deprive, by means of material false and fraudulent pretenses, representations, and promises, and for the purpose of executing the above-described scheme and artifice to defraud and deprive, transmitted and caused to be transmitted

by means of wire communication in interstate commerce, any writings, signs, signals, pictures, and sounds, that is, the following:

Count	Defendant(s)	Date	VA Disability Benefit Electronic Fund Transfer
10	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [3] VICTOR GARCIA-SOTO [4] BRENDA GARCIA	01/30/2025	\$346.95 to [3] VICTOR GARCIA-SOTO bank account
11	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [3] VICTOR GARCIA-SOTO [4] BRENDA GARCIA	02/06/2025	\$107.30 to [3] VICTOR GARCIA-SOTO bank account
12	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [3] VICTOR GARCIA-SOTO [4] BRENDA GARCIA	02/26/2025	\$213.61 to [3] VICTOR GARCIA-SOTO bank account
13	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [3] VICTOR GARCIA-SOTO [4] BRENDA GARCIA	02/28/2025	\$3,381.30 to [3] VICTOR GARCIA-SOTO bank account
14	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [3] VICTOR GARCIA-SOTO [4] BRENDA GARCIA	02/28/2025	\$213.61 to [3] VICTOR GARCIA-SOTO bank account
15	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [3] VICTOR GARCIA-SOTO [4] BRENDA GARCIA	03/20/2025	\$3,377.05 to [3] VICTOR GARCIA-SOTO bank account
16	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [3] VICTOR GARCIA-SOTO [4] BRENDA GARCIA	04/01/2025	\$4,044.91 to [3] VICTOR GARCIA-SOTO bank account

17	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [3] VICTOR GARCIA-SOTO [4] BRENDA GARCIA	05/01/2025	\$4,0441.91 to [3] VICTOR GARCIA-SOTO bank account
18	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [3] VICTOR GARCIA-SOTO [4] BRENDA GARCIA [5] GABRIEL GARCIA	01/15/2025	\$10,758.90 to [5] GABRIEL GARCIA bank account
19	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [3] VICTOR GARCIA-SOTO [4] BRENDA GARCIA [5] GABRIEL GARCIA	01/31/2025	\$4,186.43 to [5] GABRIEL GARCIA bank account
20	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [3] VICTOR GARCIA-SOTO [4] BRENDA GARCIA [5] GABRIEL GARCIA	02/28/2025	\$4,186.43 to [5] GABRIEL GARCIA bank account
21	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [3] VICTOR GARCIA-SOTO [4] BRENDA GARCIA [5] GABRIEL GARCIA	04/01/2025	\$4,186.43 to [5] GABRIEL GARCIA bank account
22	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [3] VICTOR GARCIA-SOTO [4] BRENDA GARCIA [5] GABRIEL GARCIA	05/01/2025	\$4,186.43 to [5] GABRIEL GARCIA bank account
23	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [4] BRENDA GARCIA [6] RANDOLPH BAEZ	04/14/2025	\$5,583.72 to [6] RANDOLPH BAEZ bank account

24	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [4] BRENDA GARCIA [6] RANDOLPH BAEZ	05/01/2025	\$1,395.93 to [6] RANDOLPH BAEZ bank account
25	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [7] JOSE TORRES-ROSADO	02/28/2025	\$2,489.96 to [7] JOSE TORRES-ROSADO bank account
26	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [7] JOSE TORRES-ROSADO	04/01/2025	\$4,044.91 to [7] JOSE TORRES-ROSADO bank account
27	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [7] JOSE TORRES-ROSADO	05/01/2025	\$4,044.91 to [7] JOSE TORRES-ROSADO bank account
28	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [8] ELADIO PAGAN	11/27/2024	\$4,300.64 to [8] ELADIO PAGAN bank account
29	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [8] ELADIO PAGAN	11/29/2024	\$924.00 to [8] ELADIO PAGAN bank account
30	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [8] ELADIO PAGAN	11/29/2024	\$2,040.28 to [8] ELADIO PAGAN bank account
31	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [8] ELADIO PAGAN	12/31/2024	\$2,092.19 to [8] ELADIO PAGAN bank account
32	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [8] ELADIO PAGAN	01/31/2025	\$2,092.19 to [8] ELADIO PAGAN bank account
33	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [8] ELADIO PAGAN	02/24/2025	\$6,121.57 to [8] ELADIO PAGAN bank account

34	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [8] ELADIO PAGAN	02/28/2025	\$633.77 to [8] ELADIO PAGAN bank account
35	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [8] ELADIO PAGAN	02/28/2025	\$2,092.19 to [8] ELADIO PAGAN bank account
36	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [8] ELADIO PAGAN	04/01/2025	\$2,725.96 to [8] ELADIO PAGAN bank account
37	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [8] ELADIO PAGAN	04/16/2025	\$9,045.23 to [8] ELADIO PAGAN bank account
38	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [8] ELADIO PAGAN	05/01/2025	\$4,307.49 to [8] ELADIO PAGAN bank account
39	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [9] IGNACIO RAMOS-CLASS	12/16/2024	\$3,566.62 to [9] IGNACIO RAMOS-CLASS bank account
40	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [9] IGNACIO RAMOS-CLASS	12/31/2024	\$3,831.30 [9] IGNACIO RAMOS-CLASS bank account
41	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [9] IGNACIO RAMOS-CLASS	01/31/2025	\$3,831.30 [9] IGNACIO RAMOS-CLASS bank account
42	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [9] IGNACIO RAMOS-CLASS	02/28/2025	\$3,831.30 [9] IGNACIO RAMOS-CLASS bank account
43	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [9] IGNACIO RAMOS-CLASS	04/01/2025	\$3,831.30 [9] IGNACIO RAMOS-CLASS bank account
44	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN	05/01/2025	\$3,831.30 to [9] IGNACIO RAMOS-CLASS

	[9] IGNACIO RAMOS-CLASS		bank account
45	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [10] FELIX ARROYO-RIVERA	01/31/2025	\$1,637.89 to [10] FELIX ARROYO-RIVERA bank account
46	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [10] FELIX ARROYO-RIVERA	01/31/2025	\$252.08 to [10] FELIX ARROYO-RIVERA bank account
47	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [10] FELIX ARROYO-RIVERA	02/28/2025	\$1,890.96 to [10] FELIX ARROYO-RIVERA bank account
48	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [10] FELIX ARROYO-RIVERA	04/01/2025	\$3,424.30 to [10] FELIX ARROYO-RIVERA bank account
49	[1] ANGEL CARRER-RIVERA [2] RICHARD RIVERA-MAITIN [10] FELIX ARROYO-RIVERA	05/01/2025	\$3,424.30 to [10] FELIX ARROYO-RIVERA bank account

All in violation of 18 U.S.C. § 1343.

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FORFEITURE ALLEGATION

1. The allegations contained in Count One through Forty-nine of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

2. Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of 18 U.S.C. § 371, 1341, 1343, or 13491, the defendants

[1] ANGEL CARRER-RIVERA,
[2] RICHARD RIVERA-MAITIN,
[3] VICTOR GARCIA-SOTO,
[4] BRENDA GARCIA,
[5] GABRIEL GARCIA,
[6] RANDOLPH BAEZ,
[7] JOSE TORRES-ROSADO,
[8] ELADIO PAGAN,
[9] IGNACIO RAMOS-CLASS, and
[10] FELIX ARROYO-RIVERA

shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to said violation(s).

3. If any of the property described above, as a result of any act or omission of the defendant[s]:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

TRUE BILL,

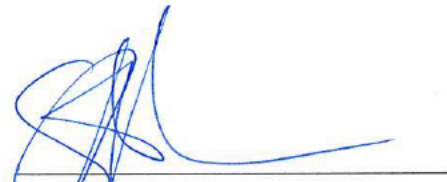
FOREPERSON

Date: 5-21-2025

W. STEPHEN MULDROW
United States Attorney

A handwritten signature in blue ink, appearing to read 'Seth A. Erbe', written over a horizontal line.

Seth A. Erbe
Assistant US Attorney
Chief, Financial Fraud &
Public Corruption Section

A handwritten signature in blue ink, appearing to read 'Scott Anderson', written over a horizontal line.

Scott Anderson
Assistant US Attorney